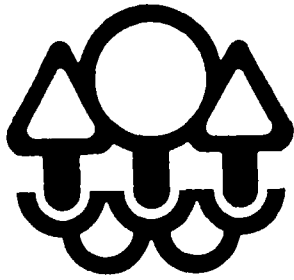




347814



Minnesota Pollution Control Agency

February 20, 1985

Mr. Dennis Thorson
Safety Officer
Aligned Fiber Composites
Highway 52 South
Chatfield, Minnesota 55923

Dear Mr. Thorson:

RE: MPCA Hazardous Waste Inspection
Aligned Fiber Composites
Chatfield, MND062859038, Generator

The Minnesota Pollution Control Agency (MPCA) is carrying out the provisions of the Minnesota Hazardous Waste Rules (Chapter 7045). In this effort, personnel of the MPCA are conducting inspections of companies in Minnesota that are engaged in the generation, transportation, storage, treatment, or disposal of hazardous waste.

This letter acknowledges that Aligned Fiber Composites (AFC) was inspected on January 23, 1985 by Bill Thompson and Paul Klinge of the Solid and Hazardous Waste Division of the MPCA. Your company was represented by Mr. Lyall Mensink and yourself. Based on an analysis of past manifests and estimates you provided, AFC currently generates about two to three 55-gallon drums of waste acetone, three 55-gallon drums of waste dichloromethane, and an undetermined volume of Stoddard's solvent per month. According to Chapter 7045, this total generation rate qualifies the company as a hazardous waste generator.

The inspection revealed the following inadequacies which must be addressed:

1. You indicated that the company has begun planning for a personnel training program, as referenced in the AFC Hazard Communication Compliance Plan. This plan must be amended to include the specific provisions of Chapter 7045.0454.
2. A contingency plan as required by Chapter 7045.0572 must be prepared and maintained at the facility. A copy of this plan must be submitted to the MPCA for review.

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3. Outdoor storage of waste acetone, waste dichloromethane, and waste pigment is provided by a locked and posted semi-trailer. This trailer is located behind the facility on open ground. A small hole to the left of the door is located at floor level. The floor of the trailer consists of metal "runners," which allows a space where liquids could accumulate.

Free liquids stored outdoors must be contained in a curbed or diked area (please see Chapter 7045.0292). If a spill occurred during loading, or if a drum leaked during storage, liquid hazardous waste could reach the ground. A leak or spill in the trailer would be difficult to clean up, since liquids would go beneath the "runners," and absorbent material would be ineffective.

If the company decides to continue storage of hazardous wastes in the trailer, a solid floor or liner must be provided to ensure that any spill or leak could be contained and easily removed. The company will need to provide an alarm system, a communication device, a portable fire extinguisher, and spill control equipment at the trailer as required by Chapter 7045.0566. The MPCA recommends that containers be elevated or otherwise protected from contact with any liquid that could accumulate and that weekly inspections of the storage area be documented in a log book.

4. The annual disclosure update forms have recently been sent to AFC from the MPCA Disclosure Unit. This form should be amended to include up-to-date data on waste streams. Please include management plans for waste dichloromethane, any sludge from the dichloromethane dip tank, the Stoddard's solvent, and the miscellaneous lab chemicals that the company intends to dispose of. Please contact Mr. Doug Robohm of the MPCA Disclosure Unit at 612/296-7352 for disclosure-related matters.

The miscellaneous lab chemicals that are in small amounts and are compatible can be disposed of in accordance with Chapter 7045.0137 and 7045.0235. Depending upon volume and container type, those chemicals in large amounts should be disposed of separately. All of these waste chemicals must be manifested and labeled according to the U.S. Department of Transportation (DOT) regulations in CFR 49, Section 172.101 (1983). If you have questions concerning the DOT requirements for these wastes, please contact Mr. Pete Marcotte at 612/296-8958.

5. During our discussion you mentioned an interest in on-site recycling units for waste solvents. Management by recycling is covered under Chapter 7045.0125, and is encouraged by the MPCA. Recycling of waste acetone would not require an MPCA permit if the waste was not stored prior to recycling longer than 90 days. The University of Minnesota has recently started a Technical Assistance Program for generators on hazardous waste reduction which might offer assistance in this matter (phone: 800/247-0015).

Mr. Dennis Thorson
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Please submit a written response addressing the above applicable items to our office within 30 days of the receipt of this letter. Thank you for the tour of your facility, and for attending the January workshop in Rochester.

Sincerely,

Bill Thompson

Bill Thompson
Hazardous Waste Enforcement Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

BT/ch

cc: Vern Finseth, Fillmore County, Preston
Larry Landherr, MPCA, Rochester

RECEIVED 2-25-85